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 Seth Taylor, William Van Der Laar, Mark Wesley
 Dudley, Rachel Westrick, and Jiajun Xu*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

CHEYNE ANDERSON, JESUS
 CASTELLANO, HANNAH MIRZA,
 KATHLEEN O'BEIRNE, SETH TAYLOR,
 WILLIAM VAN DER LAAR, MARK WESLEY
 DUDLEY, RACHEL WESTRICK, JIAJUN XU,
 individually and on behalf of all others similarly
 situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:25-cv-03268-BLF

**JOINT STIPULATION AND
 [PROPOSED] ORDER
 CONTINUING BRIEFING
 SCHEDULE ON PLAINTIFFS'
 MOTION FOR LEAVE TO FILE AN
 AMENDED COMPLAINT**

Date: January 22, 2026
 Time: 9:00 AM
 Dept.: Courtroom 1
 Judge: Hon. Beth Labson Freeman

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Cheyne Anderson, Jesus Castellano, Hannah
2 Mirza, Kathleen O’Beirne, Seth Taylor, William Van Der Laar, Mark Westley Dudley, Rachel
3 Westrick, and Jianjun Zu (“Plaintiffs”), and Defendant Google LLC (“Defendant”) (collectively,
4 the “Parties”) stipulate and respectfully request that the Court enter an order setting the following
5 briefing schedule on Plaintiffs’ Motion for Leave to File an Amended Complaint (Dkt. No. 31), in
6 consideration of the following facts:

7 WHEREAS, Plaintiffs filed their Complaint on April 11, 2025 (Dkt. No. 1) and their First
8 Amended Complaint on April 17, 2025 (Dkt. No. 8);

9 WHEREAS, Defendant filed its Motion to Dismiss the First Amended Complaint on
10 June 16, 2025 (Dkt. No. 22);

11 WHEREAS, on June 25, 2025, the Court granted the Parties’ Joint Stipulation Regarding
12 Briefing Schedule for Motion to Dismiss and Resetting Deadlines for Case Management
13 Conference Statement (Dkt. No. 26) continuing the briefing schedule for the Motion to Dismiss
14 and the Initial Case Management Conference and related deadlines;

15 WHEREAS, Plaintiffs filed their Notice of Motion and Motion for Leave to File an
16 Amended Complaint (the “Motion for Leave”) on September 10, 2025 (Dkt. No. 31);

17 WHEREAS, the Court continued the hearing on Plaintiffs’ Motion for Leave to January 22,
18 2026 (Dkt. No. 34);

19 WHEREAS, the hearing on Defendant’s Motion to Dismiss (“Hearing”) was held on
20 September 18, 2025 (Dkt. No. 36), during which Plaintiffs stated their intent to possibly further
21 amend their proposed amendment, beyond what is described in the Motion for Leave;

22 WHEREAS, on September 18, 2025, the Court granted in part and denied in part
23 Defendant’s Motion to Dismiss. (Dkt. No. 37.) Specifically, the Court dismissed Count III without
24 leave to amend and dismissed Counts IV, V, and X with leave to amend to add additional plaintiffs
25 residing in New York. (*Id.*);

26 WHEREAS, following the Hearing, the Parties met and conferred regarding the briefing
27 schedule for the Motion for Leave, during which Plaintiffs reiterated that they are contemplating
28 adding additional allegations beyond what is described in their Motion for Leave;

1 WHEREAS, the Parties have agreed to allow time for Plaintiffs to share their proposed
2 amendments with Defendant, and additional time for Defendant to decide whether to consent to the
3 amendment;

4 NOW THEREFORE, in the interest of efficiency and preserving judicial resources, the
5 Parties hereby jointly stipulate, agree, and respectfully request an Order as follows:

- 6 1. That the deadline for Plaintiffs to furnish Defendant with a copy of their further
7 proposed amendments to the operative complaint be September 24, 2025;
- 8 2. That the deadline for Defendant to inform Plaintiffs as to whether it will stipulate to
9 or oppose Plaintiffs' proposed amendments to the operative complaint be October
10 3, 2025;
- 11 3. Should Defendant stipulate to allow Plaintiffs' proposed amendments, that
12 Defendant's filing of a responsive pleading to the amended complaint will be due
13 30 days after the amended complaint is deemed filed;
- 14 4. Should Defendant oppose Plaintiffs' proposed amendments, that the deadline for
15 Plaintiffs to file their revised motion for leave to amend the operative complaint be
16 October 10, 2025;
- 17 5. That the due date for Defendant's opposition to Plaintiffs' revised motion for leave
18 to amend shall be continued to October 24, 2025;
- 19 6. That the due date for Plaintiffs' reply in support of their motion for leave to amend
20 be continued to October 31, 2025;
- 21 7. That the Initial Case Management Conference be continued from October 30, 2025
22 to November 20, 2025, or the first available date thereafter, with the Parties' initial
23 disclosures pursuant to Federal Rule of Civil Procedure 26 due 14 days thereafter;
- 24 8. That the due date for the Parties' Joint Case Management Statement be continued to
25 November 13, 2025; and
- 26 9. That discovery in this case be stayed pending resolution of Plaintiffs' Motion
27 for Leave.

28 The proposed time modifications will not affect any other scheduled deadlines in this case.

1 A Proposed Order is being filed in connection with this Stipulation.

2
3 Dated: September 19, 2025

Respectfully submitted,

4 LEVI RATNER, P.C.

JONES DAY

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6 By: /s/ Aleksandr L. Felstiner

Aleksandr L. Felstiner

By: /s/ Liat L. Yamini

Aaron L. Agenbroad

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8 *Attorney for Plaintiffs Cheyne Anderson,*
9 *Jesus Castellano, Hannah Mirza, Kathleen*
10 *O'Beirne, Seth Taylor, William Van Der*
11 *Laar, Mark Wesley Dudley, Rachel*
12 *Westrick, and Jiajun Xu*

Attorneys for Defendant Google LLC

11 **ATTESTATION**

12 I, Aaron L. Agenbroad, am the ECF User whose ID and password are being used to file this
13 document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel of record for
14 all Parties have concurred in this filing.

15
16 /s/ Liat L. Yamini

Liat L. Yamini